

Atlantic Richfield Company

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July 23, 2010

Ms. Nadia Hollan
Remedial Project Manager
U.S. Environmental Protection Agency - Region 9
75 Hawthorne Street, SFD-8-2
San Francisco, California 94105

Subject: Submittal of the VLT XRF Characterization Data Summary Report, Yerington Mine Site; Administrative Order on Consent and Settlement Agreement for Removal Action and Past Response Costs, EPA Region 9 Docket No. 09-2009-0010

Dear Ms. Hollan:

Atlantic Richfield Company (ARC) has prepared the attached Data Summary Report (DSR) that describes the field activities and laboratory analytical results pursuant to the Revised VLT Characterization Work Plan Using X-Ray Fluorescence (XRF) dated November 13, 2009. As discussed with the U.S. Environmental Protection Agency - Region 9 (EPA) and others during the technical meeting held on July 15, 2010, the attached DSR does not include any inclusions or recommendations. However, ARC has prepared the following paragraph that summarizes our technical perspective on the use of XRF as a screening tool for vat leach tailings (VLT) during future removal actions:

Based on the observed correlation between copper XRF measurements and laboratory results for the VLT materials samples included in this characterization effort, copper may be suitable for XRF-based field screening of VLT materials. However, the 0.84 correlation coefficient for copper is not considered to be a good correlation and all copper concentrations are significantly below the industrial Regional Screening Level (RSL) of 41,000 mg/kg. In addition, the use of VLT materials as interim covers over areas that will likely require final covers as part of the final remedy for the evaporation ponds will not affect final cover performance. Based on the information presented in this VLT XRF DSR, ARC concludes that field screening during the evaporation ponds removal action will not be beneficial or useful for this removal action.

In addition to preparing hard copies of the VLT XRF DSR for EPA and a number of the copied recipients indicated below, it has been uploaded to the Tetra Tech/EPA Anaconda Document Library (SharePoint Partners Website <https://partners.ttemi.com/sites/epanevada/default.aspx>) in the folder entitled VLT XRF DSR July 2010.

If you have any questions regarding ARC's conclusions or the attached DSR, please contact me at (714) 228-6774 or via e-mail (jack.oman@bp.com).

Sincerely,



Jack Oman
Project Manager



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